

1. Section #1: Change Mike Padham to Mike Bedan/CH2M.
2. Section #1: Add Ken Greene/CH2M to the attendee list
3. Section #2: Regarding the proposed environmental covenant/access agreement (EC/AA):
  - a. Does this potential EC/AA preclude moving soil/rocks off site for landscaping, road beds, and/or foundations of buildings?
  - b. Also does this preclude reuse of materials from OU3 to be used in residential areas?
4. Section #3, Discussion of General Comment #5: As the EC/AA is not in place, and the terms of which are not yet known to the EPA, it is incorrect to say that a residential scenario *will* not be required. The EPA would agree that a residential scenario *may* not be required, but would not accept a human health risk assessment without this scenario given the current site circumstances. Further, OU3 includes a significant percentage of land owned by the Bureau of Land Management, therefore this EC/AA would only apply to a portion of OU3 under private ownership.
5. Section #3, Discussion of General Comment #6: “EPA wants to confirm the intention to run a risk-assessment on a sub-area by sub-area basis, not OU-wide. EPA expressed a desire to see subarea-specific risks due to a concern that “hot spot” areas may be overlooked. EPA acknowledged ARC’s position that risks specific to each individual subarea would not add significant value to remedial decision making. It was agreed by EPA and ARC that evaluation of OU-wide risks combined with evaluation of select hot spot subareas would inform EPA on possible localized risks while also providing useful information to support remedial decision-making. The definition of “hot spot” and number of such areas to be evaluated were not discussed.”
  - a. This statement mischaracterizes EPA’s intent. Addressing risk by sub-areas could add value to the remedial decision making. It was discussed that the HHRA may not need to evaluate every subarea with the emphasis on not missing hot spots, not that it would not be useful. Also, there does not need to be a specific number of hotspots identified ahead of time. The number and characteristics of a ‘hot spot’ should be based on the data.
6. Section #3, Discussion of Specific Comment #5: Characterization of no risk to the recreation user is dependent on assumptions used in the trespasser and other risk scenarios.